

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

**IN RE DIGITEK®  
PRODUCTS LIABILITY LITIGATION**

**MDL NO. 1968**

**THIS DOCUMENT RELATES TO ALL CASES**

---

**NOTICE OF VIDEO DEPOSITION**

---

Please take notice that the Plaintiffs Steering Committee will take the video deposition of **Ashesh Dave** before a court reporter or other official authorized by law to take depositions, on **Friday, May 14, 2010, at 9:00 a.m.** to be conducted at the offices of **Harris Beach PLLC, 100 Wall St., New York, New York, 10005** at which time and place you are notified to appear and take such part of said deposition as may be proper.

This deposition will be recorded stenographically and on videotape, and will comply with any relevant orders in this MDL. This deposition is noticed in the above-captioned matter for any and all purposes permitted by the Federal Rules of Civil Procedure, and any other federal, state, or local rules that apply to this action and the deposition will be taken in accordance with these rules. The oral examination will continue from day to day until completed.

Dated: April 28, 2010

Respectfully submitted,

On Behalf of the Plaintiffs' Steering  
Committee

s/Fred Thompson, III Esq.

Fred Thompson, III, Esq.  
Motley Rice, LLC  
28 Bridgeside Blvd.  
Mt. Pleasant, SC 29464

*Co-Lead Counsel*

Carl N. Frankovitch, Esq.  
Frankovitch, Anetakis, Colantonio & Simon  
337 Penco Road  
Weirton, WV 26062

*Co-Lead Counsel*

Harry F. Bell, Jr., Esq.  
The Bell Law Firm PLLC  
P. O. Box 1723  
Charleston, WV 25326

*Co-Lead and Liaison Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 28, 2010, the above notice was filed electronically and served by email to counsel as listed below.

Rebecca A. Betts, Defendants' Liaison Counsel  
Allen Guthrie & Thomas, PLLC  
P.O. Box 3394  
Charleston, WV 25333-3394

Harvey L. Kaplan, Esq.  
Shook Hardy and Bacon LLP  
2555 Grand Boulevard  
Kansas City, Missouri 64108

Matthew P. Moriarty  
Tucker, Ellis & West, LLP  
1150 Huntington Building  
925 Euclid Avenue  
Cleveland, Ohio 44115-1414

Richard A. Dean, Esq.  
Tucker Ellis and West LLP  
1150 Huntington Building  
925 Euclid Avenue  
Cleveland, Ohio 44115

Madeleine McDonough, Esquire  
Shook, Hardy, & Bacon LLP  
2555 Grand Boulevard  
Kansas City, Missouri 64108

s/Fred Thompson, III Esq.  
Fred Thompson, III, Esq.  
Motley Rice, LLC  
28 Bridgeside Blvd.  
Mt. Pleasant, SC 29464  
*Co-Lead Counsel*  
*Plaintiffs' Steering Committee*